

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BROOKLYN HEIGHTS ASSOCIATION, INC.,	:
BY ITS PRESIDENT JANE MCGROARTY,	:
FULTON FERRY LANDING ASSOCIATION,	:
BY IT PRESIDENT JOAN ZIMMERMAN,	:
THE NEW YORK LANDMARKS	:
CONSERVANCY,	:
	:
Plaintiffs,	:
	:
v.	:
	:
NATIONAL PARK SERVICE,	:
KENNETH SALAZAR,	:
Secretary of the U.S. Department of the Interior,	:
and	:
BROOKLYN BRIDGE PARK DEVELOPMENT	:
CORPORATION,	:
	:
Defendants.	:
	:
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11 CV 0226 (ENV)

NOTICE OF MOTION

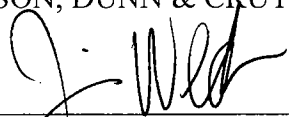
PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction, dated March 8, 2011, the Declaration of Jane McGroarty in Support of Plaintiffs' Motion for Preliminary Injunction, dated March 8, 2011, the Declaration of Joan Zimmerman in Support of Plaintiffs' Motion for Preliminary Injunction, dated March 8, 2011, and the Declaration of Jim Walden in Support of Plaintiffs' Motion for Preliminary Injunction, dated March 8, 2011, and all of the exhibits appended thereto, and in accordance with the Court's Order To Show Cause ("Order"), dated March 4, 2011, Plaintiffs move for a preliminary injunction, directing Defendant National Park Service to restore the Section 6(f) boundary map to include the Tobacco Warehouse and Empire Stores within the boundaries delineating federally protected outdoor recreational space, and enjoining Defendant Brooklyn

Bridge Park Development Corporation from taking any action changing the use of the Tobacco Warehouse and Empire Stores to other than federally-protected parkland.

As provided by the Court's Order, Defendants' opposition is due March 14, 2011, Plaintiffs' reply is due March 17, 2011, and counsel for all parties are to appear on March 21, 2011 at 10:00am in Courtroom 4C South before the Honorable Judge Vitaliano to show cause as to whether Plaintiffs' request for a preliminary injunction should be granted.

Dated: New York, New York
March 8, 2011

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